

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BO TUREK, individually,)
and on behalf of all others similarly situated,)
)
 Plaintiff,) Case No: 1:25-cv-01842
)
 v.) Hon. Judge Mary M. Rowland
)
REVOLUTION GLOBAL, LLC, et al.,) Hon. Magistrate Judge Young B. Kim
)
 Defendants.)
)

UNOPPOSED MOTION FOR EXTENSION OF TIME

Defendants Revolution Global, LLC, Revolution Global Health, Inc., Revolution Illinois Holdings, LLC, Revolution Core Holdings, LLC, Revolution Ventures, IL, LLC, Revolution Ventures IL II, LLC, Revolution IP Ventures, LLC, and Revolution Cannabis – Delavan, LLC (collectively, “Revolution”), by and through undersigned counsel and pursuant to Federal Rule of Civil Procedure 6(b), hereby move for an extension of time through March 31, 2025 to respond to Plaintiff’s Class Action Complaint, and in support thereof states as follows:

1. On January 17, 2025, Plaintiff initiated this civil action against Revolution by filing a Complaint in the Circuit Court of Cook County, Illinois, Chancery Division captioned *Bo Turek v. Revolution Global, LLC*, No. 2025CH00520 (the “Class Action Complaint”). On January 22, 2025, Revolution was served.
2. On February 24, 2025, Revolution removed this case to this Court under 28 U.S.C. §§ 1332, 1441 and 1446.
3. Pursuant to Federal Rule of Civil Procedure 81(c), Revolution’s deadline to file its responsive pleading is February 28, 2025. *See Fed. R. Civ. P. 81(c)(2)(C).*

4. Undersigned counsel is investigating the allegations in the Class Action Complaint, which investigation is critical to determining how Revolution will respond to the complex and extensive 45-page Complaint.

5. On February 20-21, 2025, counsel for Revolution reached out to and conferred with counsel for Plaintiff. Plaintiff does not oppose the relief sought herein.

6. Revolution thus respectfully requests that this Court extend the deadline for Revolution's responsive pleading by 30 days—up to and including March 31, 2025.

7. This is Revolution's first request for an extension and this Motion is not being made for purposes of delay or any improper purpose.

Dated: February 24, 2025

/s/ Mark S. Eisen

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed with the Clerk of the Court and that copies of the foregoing were transmitted to all parties of record via the Court's CM/ECF electronic filing system.

/s/ Mark Eisen